ATTACHMENT I

OUTLINE FOR THE STATE SENIOR EMPLOYMENT SERVICES COORDINATION PLAN

Section 1. Plan Participation.

As required in section 503(a)(1) of the OAA, the State Plan must describe the process the Governor or his/her designee used to ensure the participation of interested organizations and individuals in the development of the State Plan.

Section 2. Involvement of organizations and individuals.

As required in section 503(a)(2) of the OAA, the State Plan must describe the involvement of the following parties in the planning process:

- State and Area Agencies on Aging
- State and Local Boards under the Workforce Investment Act (WIA)
- Public and private nonprofit agencies and organizations providing employment services, including each grantee operating an SCSEP project within the State, except national grantees serving older American Indians
- Social service organizations providing services to older individuals
- Grantees under title III of the OAA Amendments
- Affected communities
- Underserved older individuals
- Community-based organizations serving older individuals
- Business organizations
- Labor organizations
- Other interested organizations and individuals, including SCSEP participants

Section 3. Public Comments.

As required in section 503(a)(3) of the OAA Amendments, the State Plan must provide a description of the State's procedures and time line for ensuring an open and inclusive planning process that provides a meaningful opportunity for public comment. The State Plan should include an appendix of all public comments received, and a summary thereof.

Section 4. State Plan Provisions.

Section 503(a)(4) and (6) of the OAA Amendments address the mandatory content requirements for the State Plan. The Department believes that most of the data required to satisfy these mandatory content requirements can be accessed from readily available sources—i.e., the U.S. Census and data that grantees already possess and/or report. In addition, grantees may utilize the detailed county by county data on the characteristics of the eligible population that by county was be distributed by DOWP last year. If you are unable to find this information please contact the DOWP.

The State Plan must provide information on the following:

a. Basic Distribution of SCSEP Positions within the State. State Plans must provide information on the ratio of individuals in each service area to the total eligible population in the State. Reference should be made to the Equitable Distribution (ED) Report, which is required by Section 508 of the OAA Amendments. This report provides the basic information needed to assess the location of the eligible population and the current distribution of people being served. The report may be summarized to identify the areas, if any, that are significantly under-served or over-served. The most recent ED Report, must be attached as a second appendix to the State Plan. The State Plan must identify where slots need to be moved by a grantee(s) from over- to under-served areas and what the procedures to accomplish this will be. The Plan must also describe the timelines for how this will be accomplished.

Both the national and the State grantees are expected to move positions from over-served to underserved locations. Any prior practice and policies that permitted the retention of positions in an over-served area is not consistent with the OAA Amendments. The State Plan must reference and build on the ED Report in addressing the requirement to describe the basic distribution of SCSEP positions within the State. Grantees may not move slots from one geographic area to another without first notifying the State agency responsible for preparing the State Plan and the ED Report and receiving approval from the Department.

b. Rural and Urban Populations. State Plans must provide information about the relative distribution of individuals residing in rural and urban areas within the State. For 2005, this information may be included on a statewide basis, a county-by-county basis or some other geographic area basis. The Governor or his/her designee must decide which approach will be utilized.

Both rural and urban areas of a State need to be served equitably. If rural areas of the State have inadequate resources to enable program requirements to be met (e.g., few host agencies or employers, lack of transportation, low educational levels of eligible individuals, etc.), the State Plan must address what the project plans to do to address those needs, and how the plan will be accomplished, including time lines.

c. Special Populations. Consistent with the requirements at § 641.525, State Plans must provide information about the relative distribution of those eligible individuals with greatest economic needs, eligible individuals who are minorities, and eligible individuals with the greatest social needs. The State Plan must address how all grantees operating with the State will recruit and serve these populations in PY 2005.

As indicated in item (b) above, the Governor or his/her designee may decide how information on special populations is to be displayed. The following descriptions will be used for submitting this information:

(1) "Greatest economic need" means those persons at or below the poverty level

established by the Department of Health and Human Services and approved by the Office of Management and Budget;

- (2) "Minorities" include: American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino American, and Native Hawaiian or Other Pacific Islander;
- (3) "Greatest social need" means needs caused by non-economic factors. It includes persons with physical and mental disabilities; language barriers; and cultural, social, or geographic isolation, including isolation brought about by racial or ethnic status.

When preparing to discuss the items mentioned in items (b) and (c) above, it will be necessary to make use of the best available information at the local level.

d. Type of Skills. The State Plan must describe the employment situations and the skills available among the eligible population in PY 2005. The source of this information must be identified, as well as progress and results in the collection of data.

The type of skills available among the eligible population has direct implications for host agencies recruited and developed; types of training positions available at the host agencies; skill training offerings located or developed; and training linkages negotiated and established with the One-Stop. The State Plan must discuss how all the grantees in the State will address these issues to ensure that projects are truly providing skill training that meets the needs of both participants and employers.

- e. Community Service Needs. The State Plan must identify the types of community services that are needed, and the places where these services are most needed. The State Plan should specifically identify the needs and locations of those individuals most in need of community services and the groups working to meet their needs. Once unmet community service needs are identified, it is the responsibility of each grantee operating in the State to work toward meeting those needs through recruitment of appropriate host agencies. The State Plan must discuss the process that will be employed to identify community service needs and the timeline for identifying and recruiting appropriate host agencies to meet those needs.
- f. Coordination with the Workforce Investment Act. The State Plan must describe actions taken or planned to coordinate activities of SCSEP grantees with the activities being carried out in the State under title I of WIA. The State Plan must describe the steps being taken to ensure that the SCSEP is an active partner in each One-Stop delivery system, and the steps that will be taken to encourage and improve coordination with the One-Stop delivery system. Examples of specific collaborative efforts would be a description of the co-enrollment of SCSEP participants in the One-Stop delivery system and a description of how States will coordinate SCSEP planning activities with planning under WIA Title I for the Strategic Plan, which will commence in PY 2005.

The State Plan must also provide detailed information about the MOU development process. A sample checklist to capture this information is provided in Attachment II.

g. Avoidance of Disruptions. The State Plan must describe the steps the Governor, or his/her designee, will take to avoid disruptions. When there are new Census data indicating that there has been a shift in the location of the eligible population or when there is over-enrollment for any other reason, the Department recommends that all grantees gradually shift positions and encourage employment to make positions available for eligible individuals in the areas where has been an increase in the eligible population. (The Department does not define disruptions to mean that participants are entitled to remain in a subsidized community service employment position indefinitely.) The State Plan must describe the procedures the grantees will employ to avoid disruptions in situations where there are population shifts or over-enrollments and the timelines for accomplishing the shifting of positions.

Section 5. State Plan Recommendations. The State Plan may include recommendations to the Secretary of Labor on actions to be taken by SCSEP grantees in the State to improve SCSEP services. The recommendations may include such topics as the location of positions, the types of community services, the time required to make changes in the distribution of positions, and the types of participants to be enrolled. If recommendations are provided, they should reflect the items discussed in Section 4, above, State Plan Provisions. They should also be realistic recommendations that the Secretary may consider.